



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 06 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bradley Chandler
EHS and Electrical Coordinator
Mesker Door, Inc.
3440 Stanwood Boulevard
Huntsville, Alabama 35811

SUBJ: RCRA Compliance Evaluation Inspection
Mesker Door, Inc.
EPA ID # ALR000003236

Dear Mr. Chandler:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the March 15, 2017, inspection of Mesker Door, Inc. located at 3440 Stanwood Boulevard, Huntsville, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up. If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Bailey Dykes, Industrial Hazardous Waste Program, ADEM Land Division (via electronic mail)



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VIA ELECTRONIC MAIL

Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Mesker Door, Inc.
EPA ID Number: ALR000003236

Dear Mr. Crockett:

On March 15, 2017, a U.S. Environmental Protection Agency compliance evaluation inspection was conducted at Mesker Door, Inc., located in Huntsville, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA). Apparent violations of RCRA were discovered. Please follow-up with Mesker Door, Inc. to ensure the violations have been addressed.

Enclosed is a copy of the EPA inspection report. If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Mesker Door, Inc.
3440 Stanwood Boulevard
Huntsville, Alabama 35811
Madison County
EPA ID: ALR000003236

3) Responsible Official

Bradley Chandler
EHS and Electrical Coordinator
Mesker Door, Inc.
3440 Stanwood Boulevard
Huntsville, Alabama 35811

4) Inspection Participants

Bradley Chandler	Mesker Door, Inc.
Bailey Dykes	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

March 15, 2017 at 8:30 a.m. CDT

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

ADEM Administrative Code 335 Division 14

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Mesker Door, Inc., EPA ID# ALR000003236 with the applicable regulations.

8) Facility Description

The Mesker Door, Inc., Huntsville, Alabama is a manufacturer of hollow steel doors and frames, and specialty doors. The facility receives rolls of steel which are cut into lengths. The predetermined length of steel is punched and formed into specific requirements, either standard stock or custom order. The formed door or frame is washed with a zinc based process to wash off the oil and contaminants. The doors have polystyrafoam glued inside before end caps are welded on to the front and back panels of the doors. The doors then undergo electrostatic paint process before they are packaged and shipped.

Metal frames parts are punched and formed from the steel rolls, then welded together. The frames are then hung and painted using a water based Flow Coat process. The frames are then packaged and shipped.

The Huntsville location has been in operation since 1996 and is also the headquarters for the company. The facility is located on 5 acres with a production area of 250,000 square feet. The facility has 210 employees, and operates twenty-four hours a day, three shifts and five days a week. The facility produces 500 doors per shift.

The Mesker Door, Inc.'s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 2, 2016, characterized the facility as a conditionally exempt small quantity generator (CESQG) of hazardous waste.

Currently Mesker Door, Inc. may generate hazardous waste streams, used oil and universal wastes (such as spent batteries and certain types of lamps), waste solvent, spent aerosol cans, paint waste and other wastes which include EPA Waste Codes D001 and D002.

9) Previous Inspection History

This facility was previously last inspected on June 7, 1999 by the EPA and ADEM. Four issues were found and returned to compliance on June 30, 1999.

10) Findings

Upon arriving at the Mesker Door, Inc. facility, the inspectors signed in at the reception desk before being escorted around the facility. The inspectors presented their credentials to Mr. Chandler at 8:30 a.m. CDT.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations.

The inspectors then performed a walk-through inspection of specific areas in the facility. The following is a description of the observations made during the walk-through.

10.1 Maintenance

The inspectors toured the maintenance area and observed materials used for spot and resistance welding. Mr. Chandler confirmed that copper, aluminum, stainless and nickel rods are used for welding and the scraps are recycled by Tennessee Valley Recycling in Decatur, AL.

At the time of the inspection, the inspectors observed discarded aerosol cans in the trash (Picture 1). The inspectors explained that unless the discarded cans are RCRA empty, no propellant is released when the nozzle is pressed, then the cans must be collected and stored until a waste determination can be conducted.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.2 Compressor Room

Next to the Maintenance area was the Compressor Room, where supplies were being stored. The inspectors observed a Safety Kleen Systems parts washer, unplugged and sitting in a secondary containment tray, and an oily waste can, that was closed and labeled (Pictures 2-4). No issues were noted in this area.

10.3 Paint Booth

The Paint Booth was in use at the time of the inspection. The inspectors observed on the top of the Paint Booth a work bench that contained a small container of solvent with nozzles for the automatic spray booth soaking inside (Picture 5).

Mr. Ben Jeglum, Paint Line Lead, explained that the paint booth filters were recently replaced. The front filters are replaced three times a week and the back blanket filters are replaced every three weeks. Mr. Jeglum also explained that the paint is water based and contains butyl cellusolve. In addition, the solvent butyl cellusolve is used to thin out the Sherwin Williams proprietary blend that is used for the door primer. The paint lines are flushed with water and butyl cellusolve whenever the facility switches between vendors. The flushed water, paint and solvent are captured in a 55-gallon drum labeled "Liquid Waste" that is stored below the paint booth. The liquid waste drum is picked up for disposal by Safety Kleen Systems.

10.4 Paint Kitchen

The Paint Kitchen is located below the Paint Booth. The inspectors observed a gray 55-gallon of clean water used for flushing and two 5-gallon containers of liquid waste flushed from the paint booth (Pictures 6, 8). Next to these containers was a blue 55-gallon drum of liquid waste that was one-third full (Pictures 6-7). These containers were not marked or labeled with their contents. Beside the flushing station, was a work table, a drying paint drum that was RCRA empty and a black 55-gallon drum used as a trash can. The inspectors observed a discarded Zinc-It aerosol can inside (Pictures 9-10). The can was not RCRA empty, the label was marked extremely flammable and the safety data sheet stated "If discarded, this product is considered a RCRA ignitable waste, D001."

Again the inspectors stated that discarded aerosol cans that are not RCRA empty should be collected and stored until a waste determination can be conducted.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.5 Flow Coat Process

The Flow Coat process applies the water based primer in a controlled, uniform film rather than an atomized spray. A storage tank pumps fresh paint that is applied to the frames staged on the assembly line. According to Mr. Jeglum, the pump system is flushed out every two weeks. The excess paint is sent to a grate which empties to a trough for recycling. Approximately, 150 gallons of paint a month is recycled. The paint spray nozzles are reused and the cast iron piping from the process is replaced and disposed of with the dirty scrap metal.

The inspectors observed two black 55-gallon drums of liquid waste stored near the process (Pictures 11-12). The drums were generated from the Paint Kitchen, and were full, closed but not labeled or dated. Mr. Jeglum said the drums were to be moved to Chemical Storage. The inspectors explained that to ensure that liquid waste was being properly disposed of, a waste determination was required because of the use of solvent in the flushed water and in the paint.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

The inspectors also observed an open black 55-gallon drum of liquid waste near beginning of the process (Pictures 13-14).

10.6 Tunnel Wash System (Line)

The Tunnel Wash System (Line) cleans the doors and frames. The line is a three-stage wash system consisting of: Stage 1 –Houghto-Prep ZP3; Stage 2 – Clean Rinse Stage; and Stage 3 – Fresh Water. Stage 1 is a heated stage using Houghto-Prep ZP3 that displaces surface soils and oils and using an efficient proprietary zirconium oxide chemistry, producing an amorphous coating that promotes paint adhesion and salt spray resistance. The inspectors observed an oil skimmer inside an open tote and a 55-gallon drum of used oil with released oil on top (Pictures 15-18). The used oil tote and drum were not closed or labeled.

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(a)1., a container holding used oil must always be closed during storage, except when it is necessary to add or remove used oil. Stage 2 uses water and defoamer only, which are recycled in the process. Stage 3 is a fresh water rinse. On the opposite side of the process is a waste water holding tank. The waste water from the

washing system is pumped to a 1,000-gallon process tank and then pumped to another 1,000-gallon tank before being sent to the city publicly owned treatment works. Mr. Emmanuelle Sledge, Maintenance, explained that caustic soda is used to adjust the pH of the waste water and remove the particulates. The waste water is then filtered using dual bag filters which are discarded in the garbage. Mr. Sledge explained that the last analysis for the filters and sludge was conducted when the system was installed in 1996. The inspectors advised Mr. Chandler that an updated waste determination was needed to confirm that the change in paint formulation did not affect the sludge and filters, and they continue to remain non-hazardous.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

At the end of the line, the frames go to the Flow Coat Process for painting.

10.7 Weld Shop

The weld shop was split into two areas. The first area was automated MIG welding using silicon bronze wire. Large pieces are loaded and cut with this welder. The second area used cup guns that are discarded when the welders are clogged up. The inspectors walked through the weld shops and observed discarded aerosol cans inside a blue trash container (Pictures 19-20). The discarded cans were not RCRA empty. Again, the inspectors stated that discarded aerosol cans that are not RCRA empty should be collected and stored until a waste determination can be conducted.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.8 Chemical Storage

The chemical storage building is used for material supply and waste storage. At the time of the inspection, the inspectors observed the following (Pictures 21-32):

- Two 55-gallon drums of bad paint closed, labeled "being returned" and dated January 26, 2017;
- One blue 55-gallon drum not closed, labeled "Waist partial 3-6-17";
- One 55-gallon drum closed, labeled "Waste Oil" and dated July 20, 2016;
- One 55-gallon drum of mop waste, closed, labeled "Floor Waste (SB)" and not dated;
- One 55-gallon drum next to the floor waste drum that was closed, not labeled or dated;
- Four 55-gallon drums of liquid waste (LW) closed, labeled and dated March 1, 2017, March 6, 2017 (2 drums) and March 7, 2017;
- Two 55-gallon drums on the same pallet as the liquid waste drums closed but not labeled or dated; and
- One 55-gallon drum of waste water (liquid waste) closed, labeled and dated February 27, 2017.

The inspectors explained that to ensure that the drums of floor waste, liquid waste and unknown waste are being properly disposed of waste determinations are required.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

Pursuant to ADEM Admin. Code r. 335-14-17-.03(4)(c)1. [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

- Six 4-foot boxes of spent fluorescent lamps, five boxes were not closed, all of the boxes were not labeled or dated (Picture 33);
- One blue crate of spent light ballasts that was closed, not labeled or dated (Picture 38);
- One 55-gallon drum that was labeled "Fluorescent Bulb Waste", closed and not dated (Picture 38);
- Ten 4-foot spent fluorescent lamps wrapped in tissue that was not contained, labeled or dated (Picture 33);
- Four broken fluorescent lamps that were not contained, labeled or dated (Pictures 35-37);
- Three 8-foot spent fluorescent lamps were not contained, labeled or dated (Picture 34);
- Two 8-foot boxes of spent fluorescent lamps were not closed, labeled or dated (Picture 34);

The inspectors stated that universal waste lamps are required to be contained and the container kept closed, labeled "Universal Waste Lamps" and marked with the date the first lamp is placed into the container. At the time of the inspection, multiple lamps were not contained, boxes of spent lamps were not closed, none of the lamps were labeled or dated. The inspectors also explained that broken lamps could be a hazardous waste and should be properly managed.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11]. Four fluorescent lamps were observed broken and not contained.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste (SQHUW) must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

Pursuant to ADEM Admin. Code r. 335-14-11-.03(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a SQHUW may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

- Two full 55-gallon drums of non-hazardous laser cutter dust and one 55-gallon empty drum to be shipped back to the manufacturer Trumpf, Inc. in Farmington, CT (Pictures 39-41);
- Six spent paint aerosol cans thrown in the trash (Pictures 42-43);
- One paint roller dried with oil-based black paint to the paint tray (Pictures 46, 48);
- One pink container of lube discarded into a blue 55-gallon drum (Pictures 44-45);
- One pink container of lube discarded on top of an open one-gallon paint can filled with discarded butyl cellusolve (Pictures 46, 47, 49); and
- Two one-gallon cans of oil based paint (Pictures 51-52).

The inspectors explained that discarded aerosol cans that are not RCRA empty should be collected and stored until a waste determination can be conducted. Also inspectors observed based on the label and safety data sheet that the dried black oil-based paint in the tray had a flashpoint of 41 degrees C and contained solvents. The inspectors stated allowing the used paint to dry is considered illegal treatment, and a waste determination is required to determine if the used paint is hazardous.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must determine if that waste is a hazardous waste following the methods articulated in ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11].

10.9 Dirty Scrap Metal Roll-off

The dirty scrap metal roll-off was located outside and contained off-specification painted doors, and off-specification frames and empty glue drums. No hazardous waste was observed in this area.

Records Review

After the walkthrough, the inspectors requested the training records; safety data sheets; and the 2014-2016 hazardous, non-hazardous, used oil and the universal waste manifests. The generator status notification (EPA Form 8700-12) was last updated March 2, 2016.

Mr. Chandler provided the 2016-2017 safety training sign-in sheets. The inspectors observed non-specific topics were listed on the sign-in sheets. The inspectors recommended that Mr. Chandler, Mr. Jeglum and any staff assigned to managing hazardous waste attend a RCRA hazardous waste management course.

Safety data sheets were reviewed for Daubond, Butyl Cellusolve and Gray Door Primer. The Daubond was manufactured by Daubert Chemical and is a non-hazardous adhesive. The Butyl Cellusolve, also known as glycol ether EB and Solvent 320 EB, is manufactured by Caldwell Coatings and is labeled as flammable. The Gray Door Primer 823-6578 is a proprietary coating manufactured by Caldwell Chemical Coatings.

Bills of lading, hazardous and non-hazardous manifests were reviewed for 2014-2016. Hazardous wastes were shipped to Clean Harbors Chattanooga, LLC (EPA ID TND982141392) in Chattanooga, TN. Only the spent parts washer solvent was shipped out as EPA Waste Code D001 waste. The remaining waste streams were shipped as non-regulated liquid or non-DOT regulated. The land disposal restriction form was reviewed.

Universal waste records were not available for review.

11) Summary

The inspectors conducted the exit meeting with Mr. Chandler. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Mesker Door, Inc. was inspected as a conditionally exempt small quantity generator of hazardous waste. At the time of the inspection, Mesker Door, Inc. did not appear to be in compliance with some requirements of RCRA.

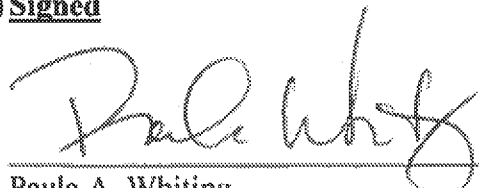
Follow Up Responses from Mesker Door, Inc.

In an April 5, 2017 email, Mr. Chandler provided photographs of the new aerosol can puncture system and the 55-gallon safety drum used to store the discarded aerosol cans waiting to be punctured.

In two April 20, 2017 emails, Mr. Chandler provided the safety data sheets for the proprietary paints used at the facility. The data sheets listed the paints as having a non-determined flashpoint and non-hazardous under RCRA disposal regulations.

In a May 4, 2017 email, Mr. Chandler provided toxicity characteristic leaching procedure analysis of the gray paint (liquid waste), the floor waste, the waste oil and the Stage 1 sludge, which were determined to be non-hazardous.

12) Signed

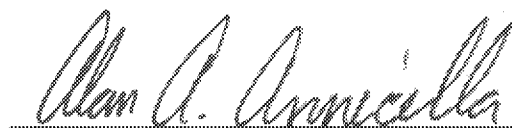


Paula A. Whiting,
Environmental Engineer

6/6/17

Date

Concurrence



Alan A. Annicella, Chief
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

6/6/17

Date

ATTACHMENT A

MESKER DOOR, INC.

HUNTSVILLE ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

MARCH 15, 2017



Picture 1 – Maintenance Shop aerosol cans discarded in the garbage



Picture 4 – Compressor Room SKS parts washer



Picture 2 – Compressor Room SKS parts washer



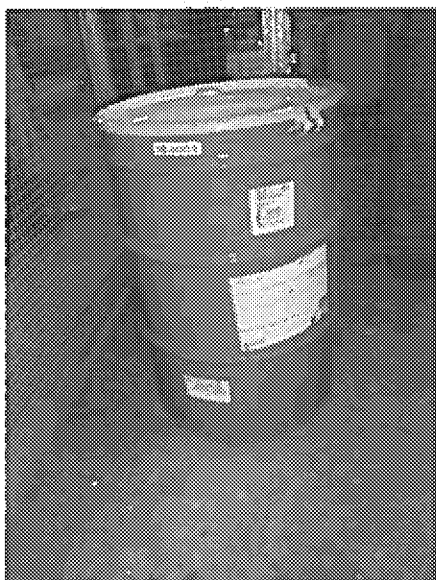
Picture 5 – Paint Booth cup of solvent soaking nozzles



Picture 3 – Compressor Room SKS parts washer



Picture 6 – Paint Kitchen liquid waste containers and drum



Picture 7 -- Paint Kitchen liquid waste drum



Picture 9 -- Paint Kitchen garbage can with a discarded aerosol can



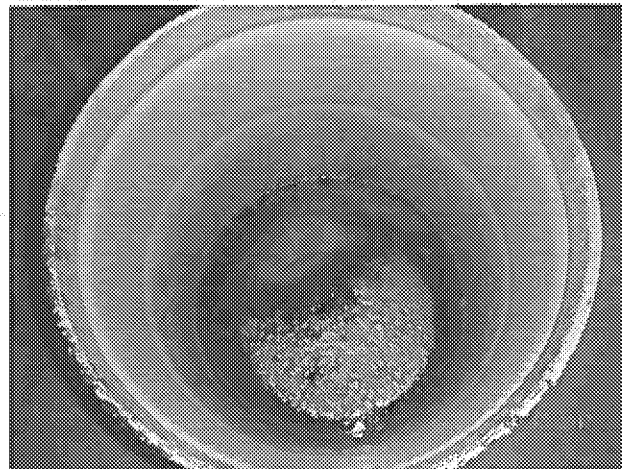
Picture 8 -- Paint Kitchen liquid waste collection containers and clean water drum



Picture 10 -- Paint Kitchen a discarded aerosol can from the garbage can



Picture 11 – Flow Coat Process two not labeled and not dated waste liquid drums



Picture 14 – Flow Coat Process waste liquid drum not labeled



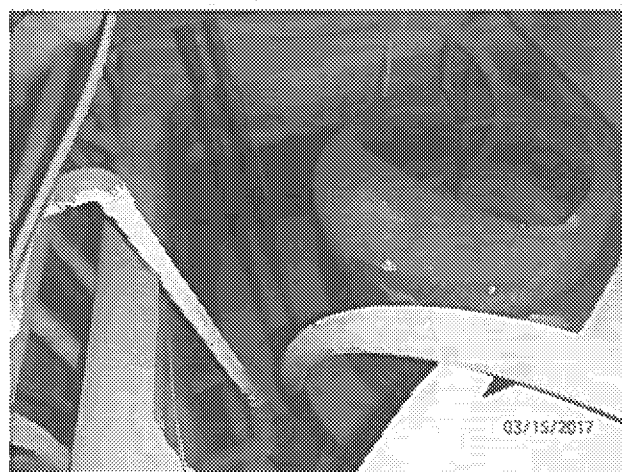
Picture 12 – Flow Coat Process two not labeled and not dated waste liquid drums



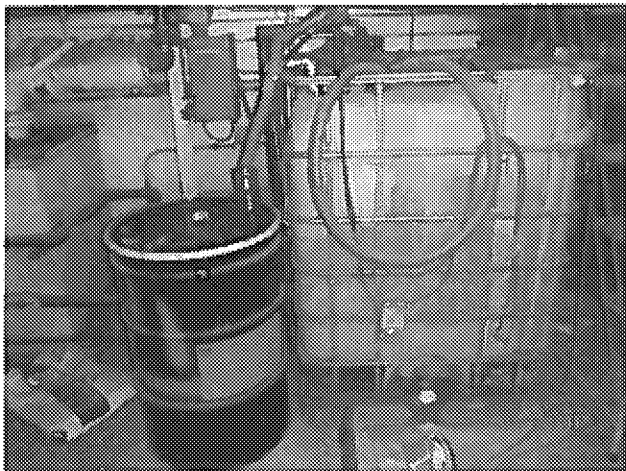
Picture 15 – Stage 1 oil skimmer tote and used oil drum



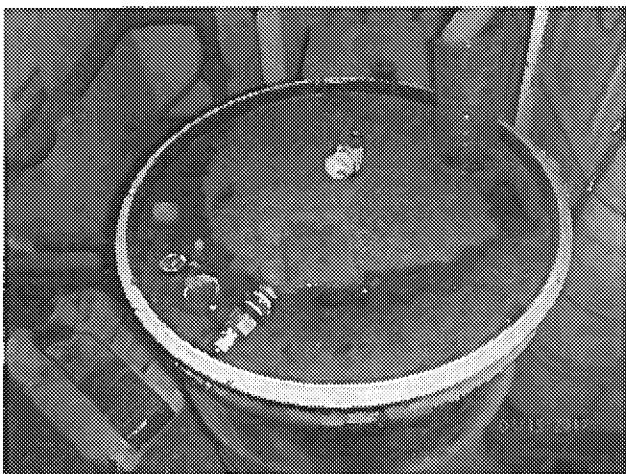
Picture 13 – Flow Coat Process waste liquid drum not labeled



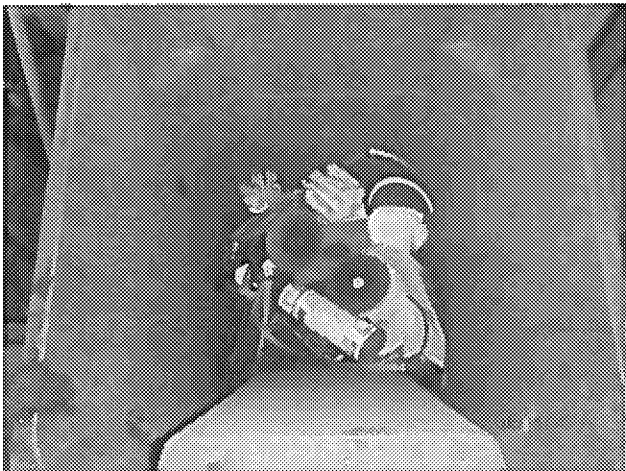
Picture 16 – Stage 1 oil skimmer tote



Picture 17 – Stage 1 oil skimmer tote and used oil drum



Picture 18 – Stage 1 used oil drum with release on top



Picture 19 – Weld Shop blue trash can with discarded aerosol can inside



Picture 20 – Weld Shop blue trash can with discarded aerosol can inside



Picture 21 – Chemical storage waste drums



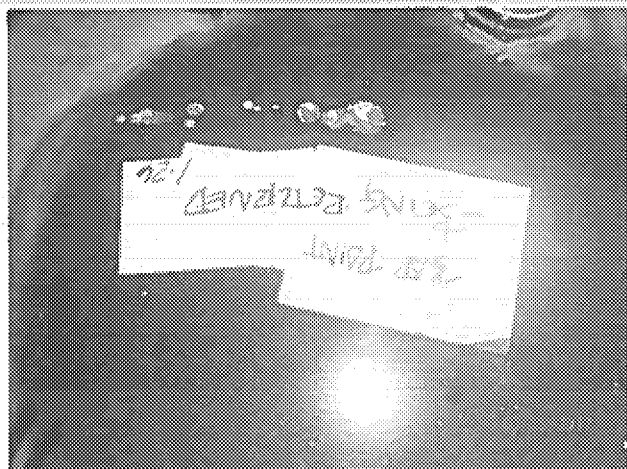
Picture 22 – Chemical storage waste drums



Picture 23 – Chemical storage bad paint drums



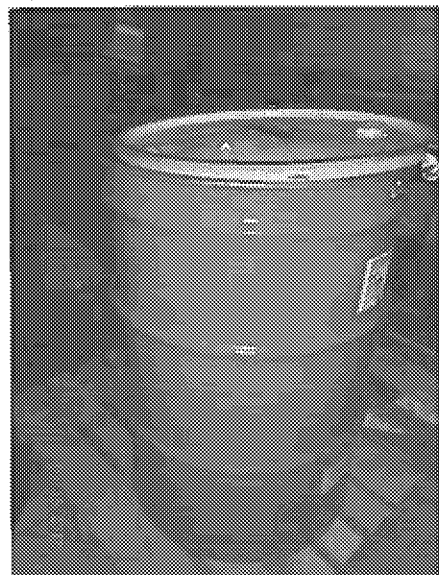
Picture 26 – Chemical storage blue drum of “waist partial 3-6-17”



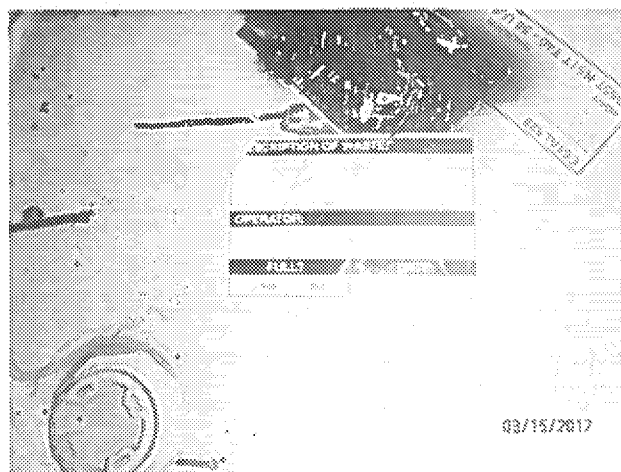
Picture 24 – Chemical storage bad paint drums



Picture 27 – Chemical storage waste oil drum



Picture 25 – Chemical storage blue drum of “waist partial 3-6-17”



Picture 28 – Chemical storage floor waste drum



Picture 29 – Chemical storage floor waste drum



Picture 30 – Chemical storage unknown and unlabeled drum



Picture 31 – Chemical storage unknown and unlabeled drum



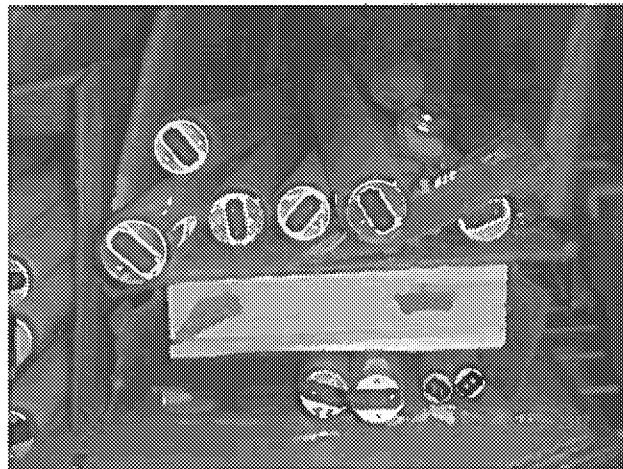
Picture 32 – Chemical storage liquid waste drums



Picture 33 – Chemical Storage universal waste lamps



Picture 34 -- Chemical Storage universal waste 8-foot lamps



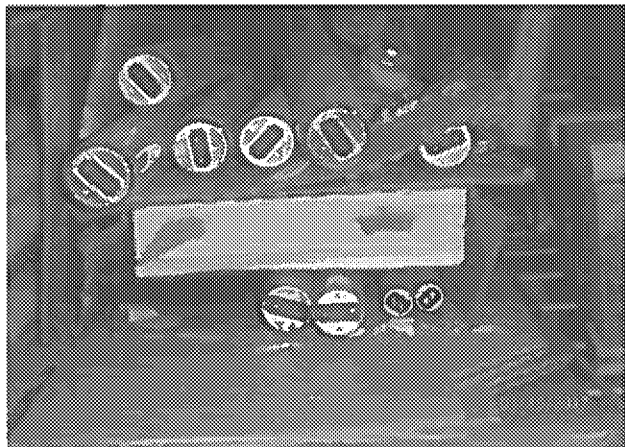
Picture 37 -- Chemical Storage universal waste lamps broken



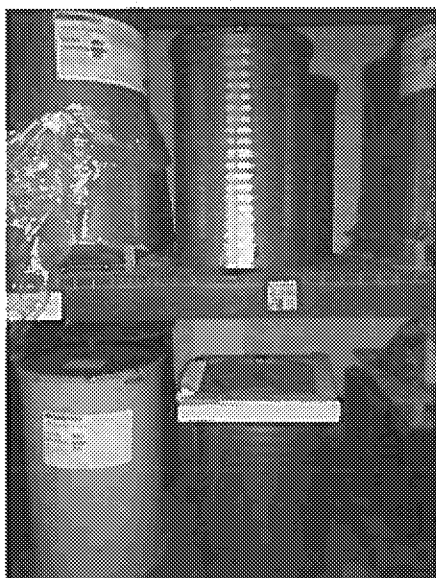
Picture 35 -- Chemical Storage universal waste lamps broken



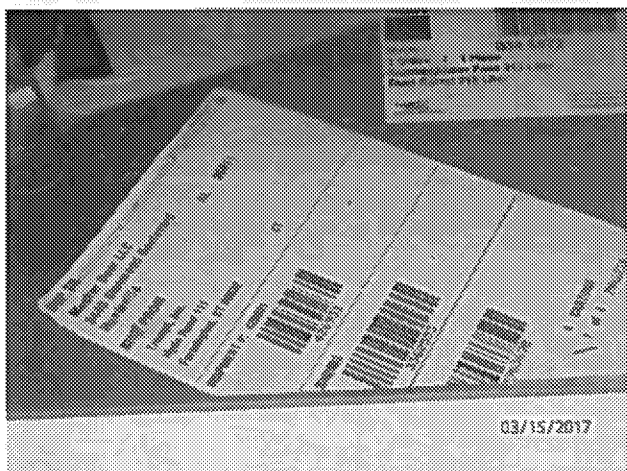
Picture 38 -- Chemical Storage universal waste lamp drum and spent ballast container



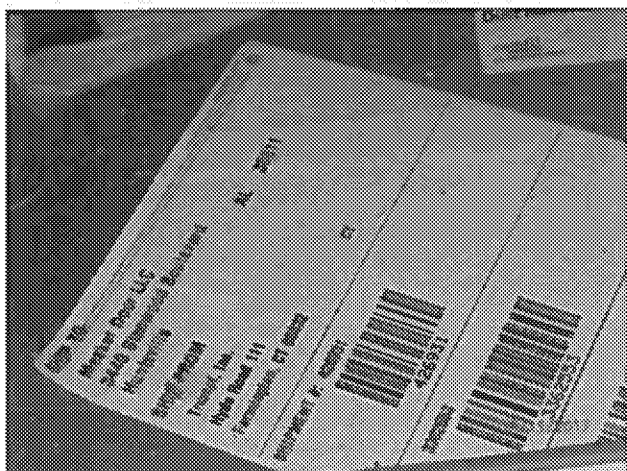
Picture 36 -- Chemical Storage universal waste lamps broken



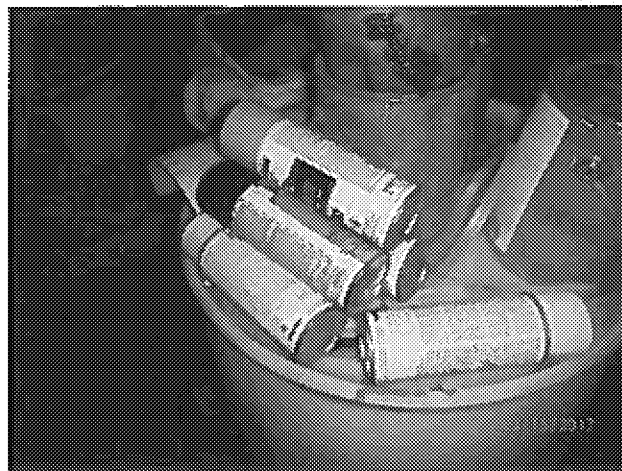
Picture 39 -- Chemical Storage laser cutter dust drums



Picture 40 -- Chemical Storage laser cutter dust drum label



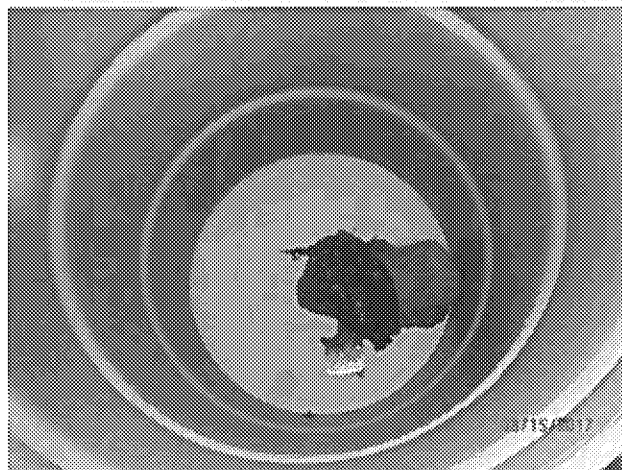
Picture 41 -- Chemical Storage laser cutter dust drum label



Picture 42 -- Chemical Storage spent aerosol can containers



Picture 43 -- Chemical Storage spent aerosol can containers



Picture 44 -- Chemical Storage discarded lube grease in a blue drum



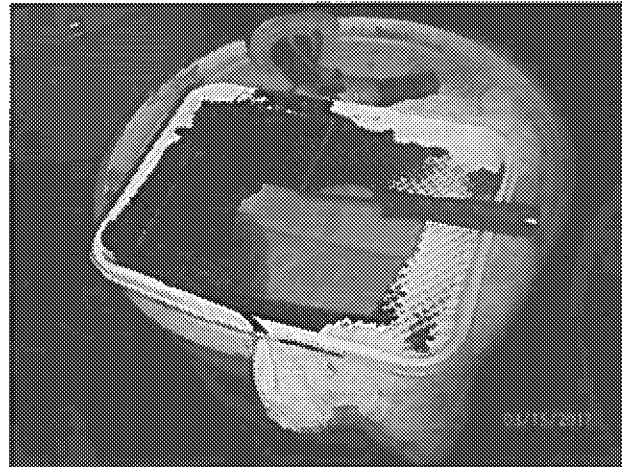
Picture 45 -- Chemical Storage discarded lube grease in a blue drum



Picture 46 -- Chemical Storage discarded lube grease, aerosol cans, dried paint tray and roller



Picture 47 -- Chemical Storage discarded lube grease in a blue drum



Picture 48 -- Chemical Storage dried paint tray and roller with oil based paint



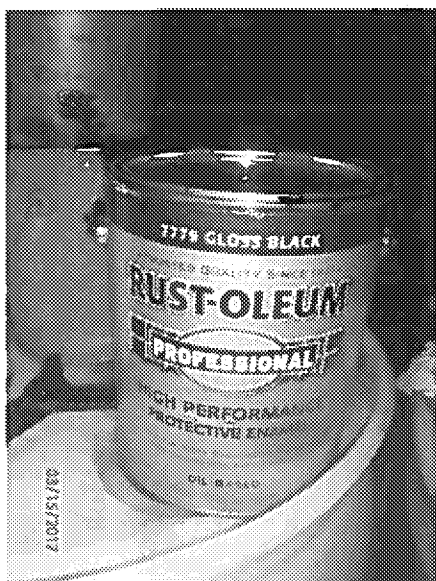
Picture 49 -- Chemical Storage discarded container of butyl cellulose



Picture 50 -- Chemical Storage drum of butyl cellulose



Picture 51 – Chemical Storage cans of oil based paint



Picture 52 – Chemical Storage can of oil based paint